

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY, SYLVIA  
DAY, JONATHAN FRANZEN, JOHN  
GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA ROBINSON,  
GEORGE SAUNDERS, SCOTT TUROW, and  
RACHEL VAIL, individually and on behalf of  
others similarly situated,

Plaintiffs,

v.

OPEN AI INC., OPENAI OPCO LLC, OPENAI  
GP LLC, OPENAI, LLC, OPENAI GLOBAL  
LLC, OAI CORPORATION LLC, OPENAI  
HOLDINGS LLC, OPENAI STARTUP FUND I  
LP, OPENAI STARTUP FUND GP I LLC,  
OPENAI STARTUP FUND MANAGEMENT  
LLC, and MICROSOFT CORPORATION,

Defendants.

Case No. 1:23-cv-08292-SHS

JONATHAN ALTER, KAI BIRD, TAYLOR  
BRANCH, RICH COHEN, EUGENE LINDEN,  
DANIEL OKRENT, JULIAN SANCTON,  
HAMPTON SIDES, STACY SCHIFF, JAMES  
SHAPIRO, JIA TOLENTINO, and SIMON  
WINCHESTER, on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI OPCO LLC, OPENAI  
GP, LLC, OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI HOLDINGS,  
LLC, OPENAI STARTUP FUND I LP, OPENAI  
STARTUP FUND GP I LLC, OPENAI  
STARTUP FUND MANAGEMENT LLC, and  
MICROSOFT CORPORATION,

Defendants.

Case No. 1:23-cv-10211-SHS

**MOTION FOR ADMISSION OF ATTORNEY PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States District Court for the Southern District of New York, I, Jordan W. Connors, hereby move this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Plaintiff and the Proposed Class in the above-captioned action.

I am an active member in good standing of the State Bar of Washington. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3, as well as a certificate of good standing from the State Bar of Washington.

Dated: October 21, 2024

*/s/ Jordan W. Connors*

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Jordan W. Connors  
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*Attorney for Plaintiffs and the Proposed Fiction and  
Nonfiction Author Classes*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2024, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the court using the CM/ECF system which will send notification to the attorneys of record and is available for viewing and downloading.

/s/ Jordan W. Connors  
Jordan W. Connors